

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SEYED MOHSEN HOSSEINI-SEDEHY,

Plaintiff,

V.

ERIN T. WITHINGTON
and CITY OF BOSTON,

Defendants.

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) Civil Action No. 04-cv-11948-RGS
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PLAINTIFF'S MOTION FOR INQUIRY OF PROSPECTIVE JURORS

Plaintiff Seyed Mohsen Hosseini-Sedehy (“Mr. Hosseini”) respectfully moves this Court pursuant to Fed. R. Civ. P. 47(a) to permit his counsel, or alternatively that the Court, to make specific inquiry of prospective jurors. As reasons therefore, Mr. Hosseini states that the requested inquiries are necessary to ensure that the jury are fair and impartial.

Mr. Hosseini requests that his counsel, or the Court, ask prospective jurors the following questions:

- 1) whether you, any member of your family, or someone close to you is or was employed as a law enforcement officer;
- 2) if the answer to question no. 1 is affirmative, whether this fact will impair your ability to be a fair and impartial juror;
- 3) whether you, any member of your family, or someone close to you is or was a member of the Teamsters' Union;

- 4) if the answer to question no. 2 is affirmative, whether this fact will impair your ability to be a fair and impartial juror;

WHEREFORE, Mr. Hosseini respectfully asks the Court to grant its motion and permit his counsel, or alternatively the Court, to make the requested inquiries of prospective jurors.

Respectfully submitted,
Seyed Mohsen Hosseini-Sedehy
By his attorneys,

/s/ Gerard A. Butler, Jr.
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Date: February 6, 2007

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 6, 2007.